

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

CRIMINAL NO. 01-80571

HON. JOHN CORBETT-O'MEARA

D-2 RAYMOND CANTY,  
a/k/a, "H", "Herm", Paul Ford,  
Raylon Lewis, Myron Harris,  
Deandre Hall,

VIO: 18 U.S.C. §3  
18 U.S.C. §1956(h)  
21 U.S.C. §841  
21 U.S.C. §846  
21 U.S.C. §848

D-5 EUGENE MITCHELL,  
a/k/a "Water", Chrishon Rolle,

Defendants.

THIRD SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

(21 U.S.C. §846 - Conspiracy to Possess  
With Intent to Distribute and to Distribute Controlled  
Substances: Cocaine and Marijuana)

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D-2 RAYMOND CANTY,  
a/k/a, "H", "HERM", Paul Ford, Raylon Lewis,  
Myron Harris, Deandre Hall

D-5 EUGENE MITCHELL  
a/k/a "Water", Chrishon Rolle,

That from in or about 1994, and continuing to on or about June 27, 2001, both dates being approximate, in the Eastern District of Michigan and elsewhere, MILTON "BUTCH" JONES, a/k/a James Mays, Mark Marshall, and "Big Boy", RAYMOND CANTY, a/k/a, "H", "Herm", Paul Ford, Raylon Lewis, Myron Harris and Deandre Hall, WALTER

JACKSON, a/k/a, "Tiger," ICHARD ODEN, a/k/a "Deshard" and "Chard," EUGENE MITCHELL, a/k/a "Water", Chrishon Rolle, LOUELLA CANTY, (nee, Louella Mercer), ERIC CANTY, a/k/a "Buck," PORTIA JONES, a/k/a, Sekina Warthern, Chaka Bone, and Chaka Bell, JAMILA JONES, KEITH STALLWORTH, CLIFFORD MATHEWS, DORTHY BURSTON, TERRANCE SCOTT, ALTHEA WILLIAMS, a/k/a Mickey McKenzie and Mickey Williams, defendants herein, did knowingly, intentionally and unlawfully combine, conspire, confederate and agree with each other and with other persons whose names are both known and unknown to the Grand Jury, to commit an offense against the United States, that is to possess with intent to distribute and to distribute controlled substances to wit: cocaine, a Schedule II Controlled Substance, Heroin and Marijuana Schedule I controlled substances, contrary to the provisions of Section 841(a)(1) of Title 21, United States Code; said conspiracy involving more than five (5) kilograms of cocaine, as defined in 21 United States Code, Section 841(b)(1)(A)(II); all in violation of Section 846, Title 21, United States Code.

It was part of the unlawful conspiracy that:

In or about 1991 RAYMOND CANTY acquired control of the Willard Hotel, a multi-unit building located at 448 Henry, Detroit, Michigan. Between approximately 1991 and approximately 1994, under the direction of RAYMOND CANTY, the conspirators utilized the Willard Hotel as a point of distribution for cocaine. Beginning in or about 1995 and continuing through approximately 1998, MILTON "BUTCH" JONES (hereinafter "BUTCH" JONES), assumed the responsibility of overseeing the distribution of cocaine, heroin and marijuana on behalf of the conspiracy at the Willard Hotel. It was further part of the conspiracy that MILTON "BUTCH" JONES maintained control over several houses in the 3700 block of Monterey, Detroit, Michigan. These houses included 3797 Monterey, 3796

Monterey and a two-family flat located to 3780-3784 Monterey. From in or about early 1997, MILTON "BUTCH" JONES and the other conspirators utilized these locations, which the conspirators referred to collectively as the "Dog Pound," as headquarters for his illegal drug distribution activities; the functions of the Dog Pound included the distribution of marijuana and cocaine, storage of marijuana and cocaine, the collection of money from drug sales, and the planning of robberies, kidnapings, and murders of rival cocaine and marijuana traffickers.

It was further part of the conspiracy that RAYMOND CANTY and MILTON "BUTCH" JONES would identify rival drug traffickers to target them for armed robberies in which controlled substances or the proceeds of the distribution of controlled substances would be stolen. RAYMOND CANTY and BUTCH JONES would also identify drug traffickers or their relatives and associates to be kidnapped and held for ransom (in the form of controlled substances or the proceeds from the distribution of controlled substances). It was further part of the ways and means of the conspiracy that RAYMOND CANTY and BUTCH JONES killed, or caused the intentional killing of others, to further their drug trafficking interests.

It was further part of the ways and means of the conspiracy that in order to conceal their drug proceeds and other illegal activities, members of the conspiracy would use false names and/or nominees to purchase and lease vehicles, acquire and sell real property, and to make hidden investments in a Detroit area nightclub known as "Tiger's" later renamed the "Xanadu Lounge."

All in violation of Title 21, United States Code, Section 846.

**COUNT TWO**

(18 U.S.C. §1956(h)- Conspiracy to  
Launder Monetary Instruments)

D-2 RAYMOND CANTY,  
a/k/a, "H", "Herm", Paul Ford, Raylon Lewis,  
Myron Harris, Deandre Hall

That from in or about 1994, and continuing to on or about June 27, 2001, said dates being approximate, in the Eastern District of Michigan, Southern Division, and elsewhere, MILTON "BUTCH" JONES, a/k/a James Mays, Mark Marshall, and "Big Boy", RAYMOND CANTY, a/k/a, "H", "Herm", Paul Ford, Raylon Lewis, Myron Harris, and Deandre Hall, LOUELLA CANTY, (Nee, Louella Mercer), PORTIA JONES, a/k/a, Sekina Warthern, Chaka Bone, and Chaka Bell, KEITH STALLWORTH, CLIFFORD MATHEWS, and ALTHEA WILLIAMS, a/k/a Althea McKenzie, Mikki McKenzie, and Mikki Williams, defendants herein, did knowingly, intentionally, and unlawfully combine, conspire, confederate, and agree with one another and with other persons, both known and unknown to the grand jury, to commit an offense against the United States, that is, the laundering of monetary instruments in violation of Title 18, United States Code, §1956(a)(1)(A)(i), (a)(1)(B)(i), and (ii); more specifically, defendants, knowing that the property involved represented the proceeds of a specified unlawful activity (the distribution of controlled substances including marijuana, cocaine, and heroin, felony violations of Title 21, United States Code, §841) did conspire and agree to conduct and attempt to conduct various financial transactions, (1) with the intent to promote the carrying on the specified unlawful activity, (2) knowing that the transactions were designed in whole or in part to conceal and disguise the nature, the location, the source, the ownership and the control of the proceeds of the specified unlawful activity, and (3) to avoid transaction reporting requirements under

state and federal law, in violation of Title 18, U.S.C., §1956(a)(1)(A)(i) and (B)(i) and (ii).

**OVERT ACTS**

In furtherance of the conspiracy and to achieve the objects thereof, the defendants and their co-conspirators, both known and unknown to the grand jury, committed and caused to be committed the numerous overt acts including the following:

1. On or about May 11, 1996, K Y C Properties, a company incorporated by RAYMOND CANTY using the alias name of Paul Ford, purchased 2847 Brooklyn, Detroit, Michigan for \$8,900.00.
2. In or about December 1997, Keith STALLWORTH recruited Clifford MATHEWS to act as a nominee purchaser of a business which STALLOWRTH owned through corporation known as "Stallworth Entertainment, Inc." This business was commonly known as "Tiger's Lounge," an adult entertainment club in Detroit, Michigan .
3. On or about December 12, 1997, RAYMOND CANTY, using the alias name of Deandre Hall, leased a 1998 Ford Taurus from Ed Schmid Ford in Ferndale, Michigan. As part of this transaction, RAYMOND CANTY as Deandre Hall provided a credit application with the social security number of 373-21-1275 that belonged to another person. This credit application stated that he had been a supervisor at Jennings Rehab and Construction for the past four years. With this application CANTY as Deandre Hall also provided the dealership with a fraudulent W-2 Form that showed he had earned \$46,219.38 in 1996 at Jennings Rehab. This W-2 Form was faxed to the dealership on or about December 10, 1997 from "Mikki".
4. On or about January 30, 1998, LOUELLA CANTY purchased 17431 Ego,

Eastpointe, Michigan for \$129,900.00. To complete this purchase, LOUELLA CANTY obtained a mortgage loan for \$110,415.00 from a financial institution. LOUELLA CANTY applied for and qualified for this loan with false financial information, including false W-2 Forms, created for her by ALTHEA WILLIAMS.

5. On or about March 16, 1998, Keith STALLWORTH obtained from another individual known to the grand jury approximately \$20,000 in proceeds from the sale of controlled substances. STALLWORTH then directed that the \$20,000 in drug proceeds be used to purchase four (4) \$5000 cashiers checks from the Michigan National Bank (check numbers 670497969-6; 670497970-5; 670497971-4; 670497972-3) payable to "Keith STALLWORTH" with a remitter of "Clifford MATHEWS." Both STALLWORTH and MATHEWS knew the funds used to purchase these checks did not belong to either Clifford MATHEWS or Keith STALLWORTH.
6. On or about March 17, 1998, Keith STALLWORTH cashed the four Michigan National Bank cashier's checks (check numbers 670497969-6; 670497970-5; 670497971-4; 670497972-3) at a branch of the Michigan National Bank and obtained approximately \$20,000 in U.S. currency. Shortly thereafter, STALLWORTH returned the \$20,000 that he obtained from cashing the cashier's checks to the drug trafficker who had provided STALLWORTH the original \$20,000 in drug proceeds.
7. On March 16, 1998, Keith STALLWORTH caused the filing of a Currency Transaction Report ("CTR") with respect to the purchase of Michigan National Bank cashier's check numbers 670497969-6; 670497970-5;

670497971-4; 670497972-3 which contained a material misstatement of fact.

8. On March 17, 1998, Keith STALLWORTH caused the filing of a Currency Transaction Report ("CTR") with respect to the negotiation/cashing of Michigan National Bank cashier's check numbers 670497969-6; 670497970-5; 670497971-4; 670497972-3 which contained a material misstatement of fact.
9. On or about October 28, 1998, RAYMOND CANTY using the alias name of Paul Ford as the President of K Y C Properties, Inc. sold 2847 Brooklyn, Detroit, Michigan for \$140,000.00.
10. On or about June 29, 1999, RAYMOND CANTY using the alias names of Deandre Hall and Paul Ford leased a 1999 F150 Ford Pickup from Mel Farr Ford in Oak Park, Michigan. As part of this transaction, RAYMOND CANTY as Paul Ford provided a credit application with the social security number of 386-84-4860 that belonged to another person. This credit application stated that he was employed at Barnes and Rezetta as a loan officer making \$650.00 per week.
11. On or about July 5, 2000, the 1999 F150 Ford Pickup that RAYMOND CANTY had leased in the alias names Deandre Hall and Paul Ford was used to transport 92 pounds of marijuana.

All in violation of Title 18, U.S.C., §1956(h).

**COUNT THREE**

(21 U.S.C. §848(e)(1)(A); 18 U.S.C. §2  
- Intentional Killing, Aiding and Abetting)

D-2 RAYMOND CANTY

a/k/a, "H", "Herm", Paul Ford, Raylon Lewis,  
Myron Harris, Deandre Hall

D-5 EUGENE MITCHELL,

a/k/a "Water", Chrishon Rolle,

On or about April 17, 1997, in the Eastern District of Michigan, Southern Division, RAYMOND CANTY and EUGENE MITCHELL, defendants herein, aiding and abetting each other, together with other persons known and unknown to the Grand Jury, while engaged in and working in furtherance of a continuing criminal enterprise and engaging in an offense punishable under Section 841(b)(1)(A) of Title 21, United States Code, relating to conspiracy to distribute over 5 kilograms of cocaine, intentionally killed and counseled, commanded, induced, procured, and caused the intentional killing of, **Misha Deandre Dorsey** (also known as Deandre Howard), and such killing resulted; in violation of Title 21, United States Code, Section 848(e)(1)(A) and Title 18, United States Code Section 2.

**COUNT FOUR**

(18 U.S.C. §3 – Accessory After the Fact)

D-2 RAYMOND CANTY

a/k/a, "H", "Herm", Paul Ford, Raylon Lewis,  
Myron Harris, Deandre Hall

On or about September 16, 1998, in the Eastern District of Michigan, Southern Division, RAYMOND CANTY, defendant herein, knowing that an offense against the United States had been committed, that is, the intentional killing of **Antoine Carruthers** as alleged in Count Four of the Second Superseding Indictment, which is hereby incorporated herein, did receive, relieve, comfort and assist the offender, Milton "Butch" Jones, in order

to hinder and prevent the offender's apprehension, trial and punishment, all in violation of Title 18, United States Code, Section 3.

THIS IS A TRUE BILL

s/ Grand Jury Foreperson  
FOREPERSON

ALAN M. GERSHEL  
United States Attorney

s/ WILLIAM J. SAUGET  
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s/ REGINA R. McCULLOUGH  
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Bar Id: P 64936

Dated: August 21, 2007

United States District Court Eastern District of Michigan	Criminal Case Cover Sheet	Case Number
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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

<b>Companion Case Information</b>		Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) <sup>1</sup> :		Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		AUSA's Initials: WJS

**Case Title:** USA v. D-2 RAYMOND CANTY, a/k/a "H", "Herm", Paul Ford,  
Raylon Lewis, Myron Harris, Deandre Hall  
D-5 EUGENE MITCHELL, a/k/a "Water", Chrishon Rolle

**County where offense occurred :** WAYNE

**Check One:**  Felony       Misdemeanor       Petty

Indictment/  Information --- no prior complaint.  
 Indictment/  Information --- based upon prior complaint [Case number: ]  
 Indictment/  Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

#### **Superseding Case Information:**

Superseding to Case No: 01-80571      Judge: JOHN CORBETT O'MEARA

Original case was terminated; no additional charges or defendants.  
 Corrects errors; no additional charges or defendants.  
 Involves, for plea purposes, different charges or adds counts.  
 Embraces same subject matter but adds the additional defendants or charges below.

**Defendant name**

**Charges**

07  
11  
12  
18-44

**Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.**

August 21, 2007  
Date

s/ WILLIAM J. SAUGET  
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